

## **London Plan consultation response**

### **Section 2**

#### **Question 9**

Central Activities Zone:

The boundary of the central activities zone in Southwark should be adjusted such that it aligns with Tower Bridge Road – excluding the Shad Thames area from it due to the residential nature of the area.

The plan should make it possible and easier to create more public amenity spaces in parts of the CAZ. For example closing off part of Union Street and surrounding roads around Flat Iron Square in Southwark to create a new public square.

The Plan should recognise the global significance and heritage of Bankside and encourage the area to be designated as a UNESCO World Heritage site.

#### **Question 17**

We agree that the housing crisis can and must be solved by building houses at volume across all tenures, but especially genuinely affordable housing. The volume of housing that is needed however must be done with communities, not imposed upon them.

There exists in legislation mechanisms that can enable communities to lead on development, and bring the sort of housing that they want to see to their areas, and genuinely see the benefit of development. The GLA should encourage, support and facilitate neighbourhood planning.

These mechanisms - such as community land auctions and community development orders – should therefore be embedded in the London Plan so that every possible source of development, especially those that are more able to gain the support of local communities, are utilised.

#### **Question 23**

We agree that land scarcity in London means that all sources of land for housing should be considered, however for inner London boroughs like Southwark, green space is rare and precious. Metropolitan Open Land (MOL) should therefore be protected as a priority, and should any MOL be acquired for housing purposes, substantially higher affordability requirements should be applied to offset the loss of public utility.

#### **Question 25**

Affordable housing:

The rate of affordable housing delivery is nowhere near fast enough. Our experience in Southwark has shown a council unable to deliver on its council home targets, and developers increasingly allowed to get away with affordable housing numbers that break both local and London planning policy, both during and after the planning process.

The definition of “affordable” is also no longer fit for purpose. Discount market rate – for either sale or rent – is still out of reach for the vast majority of local residents.

In particular, there does not seem to be a recognition of income multipliers as a factor when considering the relationship between income levels and ticket prices for discounted sale. This must be reconsidered when assessing eligibility and discount rates to ensure that those whom these products are aimed at are actually able to take advantage of them.

The result of these combined issues is increased strain on cost of living for residents, increased pressure on local authorities’ temporary accommodation costs, and it being increasingly impossible to raise a family in inner London, with schools having to close as a result.

We need the London Plan to bring decisive leadership and vision on this front, and should:

- Include improved enforcement mechanisms to ensure that consented schemes are complied with, and that there is no slippage in affordable provision over the planning process
- Adjust the tenure mix requirement for public land from 50% affordable (of a variety of affordable tenures) to exclusively tenures that are genuinely affordable - homes for social rent or London Affordable Rent
- Adjusting intermediate product definitions – such as discount market rent - to substantially lower levels, to ensure that the purpose of the intermediate tenure is fulfilled
- Retain and reinforce the existing strategic aim of 50% of new homes being affordable, and encourage boroughs that need it, such as Southwark, to go further than having this as a strategic aim and embedding it in their own local plans.

## **Question 29**

Estate regeneration:

Southwark's experience of estate regeneration has seen the provision of council housing collapse, and existing tenants forced out of the area they call home. Projects have also run on for too long, leaving "ghost estates" sat unused – with Southwark's combined empty council homes being one of the largest in the country due to this.

There should therefore be mechanisms in the London Plan that ensure that local authorities undertaking these projects face appropriate checks and balances, challenges, and improved guarantees that existing residents can expect like-for-like replacements.

### **Question 37**

#### Purpose built student accommodation

We agree that whilst these provide welcome reprieve from pressure on local housing markets from students able to out-bid local residents, the scale and density of these do have marked effects on the character and amenity of local areas. As acknowledged in the consultation document, there is also a danger of "crowding out" homes for local families.

Boroughs like Southwark face competing pressures of limited developable land and strong higher education presence, which taken together amplify the issues outlined above.

This can be managed in 2 ways:

- Requiring boroughs where this is an acute issue to introduce specific plans and/or strategies to spread out dedicated student accommodation both in time and geography to achieve the appropriate balance of supply against the negative externalities

Encourage boroughs to reflect the pressure caused by these types of accommodation on local amenity by adjusting their CIL charging schedule appropriately – for example currently in Southwark this type of development is charged the least, which does not feel appropriate given the scale and intensity of these developments in parts of the borough.

### **Section 5**

#### **Question 1:**

#### Infrastructure and Transport

The Old Kent Road regeneration had been predicated on the Bakerloo Line Extension coming in by 2029. Recent reports have suggested that stakeholders fear that without investment, the entire Old Kent Road OA enterprise could be “killed”.

With car free developments, residents will mainly be encouraged onto buses and the tube. Both are already overcrowded and TfL have admitted that they no longer object to new schemes if they threaten to cause capacity issues on the network – saying that if they did that, they’d need to object to every new development in London.

The London Plan needs to consider these challenges, and the Mayor must fulfil his promises to deliver the infrastructure that London needs to deliver on the affordable housing we need.

### Climate and Environment

New developments often show a substantial reduction in carbon footprint, but this never includes the impact of demolition and construction. This means that the figures cited end up being inflated against their true emissions. A fairer measure would be lifetime carbon footprint (ie measuring the impact of building the site and also the expected lifespan of the building before it is demolished again)

Some boroughs, like Westminster, have opted for a “reuse first” policy that minimises embedded carbon emissions. The London Plan should consider similar policies to at least incentivise this method of reducing emissions.

## **Section 4**

### **Question 19 – Designing for Everyone**

#### Crime and ASB

Crime and ASB is a continuing problem in Southwark. The guidance around “designing out” crime should be updated and strengthened in the London Plan, particularly around lighting of public amenity spaces.

#### Play spaces

Some boroughs, including Southwark, are still referring to Mayoral guidance from 2012 in their SPDs to guide minimum requirements for play spaces mandated through combinations of local and London policy and/or S.106 agreements. The London Plan should ensure both that Boroughs require the most up-to-date guidance from sector

experts, and also that the Mayors office issues, or at least leads on developing, that guidance.

### Public toilets

The provision of public toilets – and lack thereof – represent barriers to many groups of people including but not limited to:

- Disabled people
- Elderly people
- Pregnant people
- Those with continence and other health issues
- Those with young and infant children

The current scheme of Changing Places toilets and Community Toilet Schemes are inconsistent across the capital and often insufficient.

The London Plan should build on existing building regulations and policies to:

- Remove restrictions on access to toilets in places like shopping centres that are otherwise accessible to the public
- Require provision of public toilets in-situ for appropriately sized developments, or ringfenced payment in lieu for authorities to deliver their own public toilets off-site.
- Where toilets are delivered on-site, signage should be clear and widely available and accessible.
- Guidance on accessibility of the toilets themselves should be strengthened to include aspects such as providing sanitary products and in-cubicle bins for all genders.